

1 Counsel listed on next pages  
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6 UNITED STATES DISTRICT COURT  
7 NORTHERN DISTRICT OF CALIFORNIA  
8

9 Jeremy Stanfield, Romonia Persaud, and  
10 Shabnam Sheila Dehdashtian, individually, on  
behalf of all others similarly situated, and on  
behalf of the general public,

11 Plaintiffs,

12 v.

13 First NLC Financial Services, LLC, and  
14 DOES 1 through 50 inclusive,

15 Defendants.

16 Case No. C 06-3892 SBA JL  
17

**STIPULATION AND [PROPOSED]  
ORDER TO CONTINUE DATE OF  
HEARING ON PLAINTIFFS'  
STATEMENT REQUESTING LEAVE  
TO TAKE MORE THAN 10  
DEPOSITIONS AND TO COMPEL  
NOTICED DEPOSITIONS, AND TO  
CONTINUE DEADLINE FOR  
PLAINTIFFS' REPLY BRIEF  
REGARDING SAME**

18 Date Action Filed: June 22, 2006  
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1 PETER RUKIN (State Bar No. 178336)  
2 JOHN HYLAND (State Bar No. 178875)  
3 RUKIN HYLAND DORIA & TINDALL, LLP  
4 100 Pine Street, Suite 725  
San Francisco, CA 94111  
Telephone: (415) 421-1800  
Facsimile: (415) 421-1700

5 DONALD H. NICHOLS (MN State Bar No. 78918)  
(Admitted *pro hac vice*)  
6 PAUL J. LUKAS (MN State Bar No. 22084X)  
(Admitted *pro hac vice*)  
7 RACHHANA T. SREY (MN State Bar No. 3401433)  
(Admitted *pro hac vice*)  
8 MATTHEW C. HELLAND (MN State Bar No. 346214)  
(Admitted *pro hac vice*)  
9 NICHOLS KASTER & ANDERSON, PLLP  
10 4600 IDS Center  
80 South Eighth Street  
11 Minneapolis, MN 55402

12 BRYAN J. SCHWARTZ (State Bar No. 209903)  
NICHOLS KASTER & ANDERSON, LLP  
13 One Embarcadero Center  
Suite 720  
14 San Francisco, CA 94111  
Telephone: (415) 277-7236  
15 Facsimile: (415) 277-7238

16 **Attorneys for Individual and Representative Plaintiffs**

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1       TIMOTHY J. LONG (State Bar No. 137591)  
2       ORRICK, HERRINGTON & SUTCLIFFE LLP  
3       400 Capitol Mall, Suite 3000  
4       Sacramento, California 95814  
5       Telephone: (916) 447-9200  
6       Facsimile: (916) 329-4900  
7       E-mail: tjlong@orrick.com

8       MICHAEL D. WEIL (State Bar No. 209056)  
9       KATINA B. BOOSALIS (State Bar No. 244914)  
10      ORRICK, HERRINGTON & SUTCLIFFE LLP  
11      405 Howard Street  
12      San Francisco, CA 94105  
13      Telephone: (415) 773-5700  
14      Facsimile: (415) 773-5759  
15      E-mail: mweil@orrick.com  
16      E-mail: kboosalis@orrick.com

17      STEPHEN G. MORRISON (Admitted *Pro Hac Vice*)  
18      NELSON MULLINS RILEY & SCARBOROUGH LLP  
19      Meridian, 17th Floor  
20      1320 Main Street  
21      Columbia, SC 29201  
22      Telephone: (803) 255-9410  
23      Facsimile: (803) 255-9472  
24      E-mail: steve.morrison@nelsonmullins.com

25      KENNETH E. YOUNG (Admitted *Pro Hac Vice*)  
26      NELSON MULLINS RILEY & SCARBOROUGH LLP  
27      100 N. Tryon Street, 42nd Floor  
28      Charlotte, NC 28202  
29      Telephone: (704) 417-3041  
30      Facsimile: (704) 417-3012  
31      E-mail: ken.young@nelsonmullins.com

32      **Attorneys for Defendant**  
33      **First NLC Financial Services, LLC**

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1 Plaintiffs Jeremy Stanfield, *et al.* ("Plaintiffs"), on the one hand, and Defendant First NLC  
2 Financial Services, LLC ("Defendant" or "First NLC"), on the other hand (collectively, the  
3 "parties"), through their respective counsel, HEREBY STIPULATE and AGREE pursuant to  
4 Local Rule 6-2 as follows:

5 1. Plaintiffs filed their Statement Requesting Leave To Take More Than 10  
6 Depositions And To Compel Noticed Depositions ("Plaintiffs' Request") on April 5, 2007. A  
7 hearing was set for June 6, 2007.

8 2. The parties have been engaged in settlement negotiations. The parties agree that it  
9 would be injurious to the settlement process for the parties and counsel to have to devote  
10 substantial time and resources to address litigation demands.

11 3. Therefore, the parties stipulate and agree that the hearing on Plaintiffs' Request  
12 shall be continued five (5) weeks, until July 11, 2007, with Plaintiffs' reply brief regarding this  
13 motion due two weeks prior to the hearing, on June 27, 2007.

14 4. The parties have stipulated, and the Court has ordered, prior continuances to the  
15 class certification discovery deadline in this case, as set forth in the Court's scheduling order.

16 5. The requested modification to the hearing date should not have an impact on the  
17 schedule for this case.

18 6. The parties respectfully request that the May 1, 2007 Notice and Order Setting  
19 Hearing (Dkt. #251) shall be revised to state:

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The above entitled case has been set for hearing plaintiff's motion to take depositions and compel noticed depositions on **July 11, 2007** at 9:30 a.m., in Courtroom F, 15th Floor, before Magistrate Judge James Larson.

In accordance with Civil Local Rule 7-3, any reply to the opposition, already filed, shall be served and filed no later than fourteen (14) days prior to the date of the hearing.

**SO STIPULATED.**

Dated: May 18, 2007

NICHOLS KASTER & ANDERSON, LLP

By: \_\_\_\_\_ /s/  
Bryan J. Schwartz  
Attorneys for Plaintiffs and Representative Plaintiffs

Dated: May 18, 2007

ORRICK, HERRINGTON & SUTCLIFFE LLP  
NELSON MULLINS RILEY & SCARBOROUGH  
LLP

By: \_\_\_\_\_ /s/  
Michael D. Weil  
Attorneys for Defendant  
First NLC Financial Services, LLC

## ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: May 22, 2007

